



July 24, 2018

Scott R. Leibsle DVM, DABVP
Idaho State Department of Agriculture
2270 Old Penitentiary Road
Boise, ID 83712

Re: Rules Governing Dairy Byproduct Negotiated Rulemaking Sunset Clause Removal

Dr. Leibsle,

I am writing today to provide the perspective of the Idaho Dairymen's Association regarding the phosphorus threshold sunset clause removal within the Rules Governing Dairy Byproducts. As you are well aware, the dairy industry finds itself in the midst of a very significant economic downturn that will undoubtedly force some Idaho dairymen out of business. This downturn has been exacerbated by international trade disputes that have resulted in US dairy products being hit with heavy tariffs, pushing prices even lower. There are many economic factors that dairymen have no control of, leaving them feeling helpless.

Removing the sunset clause and making the phosphorus threshold standard a permanent consideration for dairymen to use in nutrient management planning is something we can do that will give dairymen certainty at a time when they seem to have little. We understand the current 1999 NRCS standard referenced in the Rule needs some aspects updated and we are committed to working with the other stakeholders to amend that standard.

If you have any questions regarding our perspective on the removal of the sunset clause please contact me at 208-308-3383 or via email at rick@idahodairymens.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Naerebout", with a stylized flourish at the end.

Rick Naerebout
Chief Executive Officer
Idaho Dairymen's Association, Inc.

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